

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:	:	Case No. 09-61616
	:	
Jeffrey Farmer and,	:	Chapter 13 Judge Hoffman
Richelle Farmer	:	
	:	
Debtor(s).	:	

DEBTORS' OBJECTION TO PROOF OF CLAIM #14

Now comes W. Mark Jump, attorney for the debtors, and objects to claim #14 by the State of Ohio Department of Taxation in the above captioned case.

Respectfully submitted,
JUMP LEGAL GROUP

/s/ W. Mark Jump
W. Mark Jump (0062837)
2130 Arlington Avenue
Columbus, OH 43221
(614) 481-4480
Attorney for Debtors

MEMORANDUM

State of Ohio filed claim #14 on February 4, 2010. Said claim was filed in the amount of \$562.42 due for priority and \$11,798.00 unsecured. Per the proof of claim, Debtors owe \$3466.00 for 2001 taxes along with interest and penalties for a total of \$6267.00 and for \$3279.00 plus interest and penalties for a total of \$5531.00 for 2003 taxes. According to Debtors' tax returns for years 2001 and 2003 debtors owed \$548 and \$181 in tax debt respectively.

Wherefore, Debtors respectfully request that the State of Ohio Department of Taxation's claim be reduced to reflect the aforementioned taxes due for 2001 and 2003 and to adjust the applicable interest and penalties accordingly.

Respectfully submitted,
JUMP LEGAL GROUP

/s/ W. Mark Jump
W. Mark Jump (0062837)
2130 Arlington Avenue
Columbus, OH 43221
(614) 481-4480
Attorney for Debtors

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NOTICE OF MOTION

W. Mark Jump, on behalf of Debtors, has filed papers with the court to Object to a Proof of Claim.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion, then on or before **thirty (30) days from the date set forth in the certificate of service for the motion**, you just file with the court a response explaining your position by mailing your response by regular U.S. Mail to Clerk of Courts, US Bankruptcy Court Southern District of Ohio, 170 North High Street, Columbus, Ohio 43215 OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the courts ECF System or by 2) regular U.S. Mail to W. Mark Jump, 2130 Arlington Avenue, Columbus, Ohio 43221. and to all other parties listed on the Certificate of Service included with this motion.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief without further hearing or notice.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Debtors' Objection to Proof of Claim #14 was served upon the parties listed below this 16th day of May, 2011, electronically or by regular U.S. mail, postage pre-paid.

/s/ W. Mark Jump

W. Mark Jump (0062837)

SERVED ELECTRONICALLY:

Frank Pees, Chapter 13 Trustee

US Trustee

SERVED VIA REGULAR U.S. MAIL:

State of Ohio Department of Taxation
Attn.: Bankruptcy Division
PO Box 530
Columbus, OH 43216-0530

Jeffrey and Richelle Farmer
5464 Baneberry Avenue
Columbus, OH 43235